UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SHEENA M. LEE, Individually and on Behalf of All Others Similarly Situated

Plaintiff(s)

-against-

B&Z AUTO ENTERPRISES, L.L.C. d/b/a Eastchester Chrysler Jeep Dodge,

Defendants.

Case No. 1:19-CV-07450

MOTION FOR EXTENSION OF DEFENDANT'S TIME TO RESPOND TO COMPLAINT

The undersigned counsel on behalf of Defendant B&Z Auto Enterprises, L.L.C. d/b/a Eastchester Chrysler Jeep Dodge, with the consent of Plaintiffs' counsel, hereby moves this court for an extension of time up to and including October 24, 2019, for Defendant to answer, move, or otherwise respond to Plaintiffs' Complaint. This is the parties' first request for an extension, and will not impact any other scheduled deadlines or appearances.

Dated: Garden City, New York September 24, 2019

Respectfully Submitted,

Labonte Law Group, PLLC

By: /s/ Scott H. Mandel
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Counsel for Defendant

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CERTIFICATION

I hereby certify that on September 24, 2019, a copy of the foregoing Unopposed Motion

for Extension of Time to File an Answer was electronically filed and served via CM/ECF to all

counsel of record.

By: /s/ Scott H. Mandel

Scott H. Mandel, Esq.